

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ANITA HOCHENDONER; EARL
HOCHENDONER; ANITA BOVA;
JOSEPH M. CARIK; BARBARA J.
CARIK; AMBER BRITTON; SHAWN
BRITTON; CHERYL BRITTON;
THOMAS OLSZEWSKI; DARLENE
COOKINGHAM; and DAVID ROBERTS,

Individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

GENZYME CORPORATION; and
MOUNT SINAI SCHOOL OF
MEDICINE OF THE CITY UNIVERSITY
OF NEW YORK,

Defendants.

Civil Action No. 2:11-CV-00313-CB

**DEFENDANTS' MOTION TO (A) DISMISS AS TO DEFENDANT MOUNT SINAI
SCHOOL OF MEDICINE FOR LACK OF PERSONAL JURISDICTION, (B) DISMISS
FOR FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED,
AND (C) TRANSFER ANY SURVIVING CLAIMS TO MASSACHUSETTS**

Defendants Genzyme Corporation and Mount Sinai School of Medicine (“Mt. Sinai”) hereby move (a) to dismiss Mt. Sinai for lack of personal jurisdiction; (b) to dismiss all claims for failure to state a claim upon which relief can be granted; and (c) to transfer any surviving claims to the United States District Court for the District of Massachusetts. The grounds for this Motion are set forth in the accompanying Brief, which is incorporated herein by reference.

Oral argument is requested.

Respectfully submitted,

Dated: April 4, 2011

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